

## Exhibit 4

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1 assume you understood the question. Does that 10:13:11  
2 make sense? 10:13:13  
3 A. Yes. 10:13:13  
4 Q. And then if you need a break at any time, 10:13:13  
5 please just let us know and we can take a break. 10:13:16  
6 The only thing that we'll ask is if there is a 10:13:19  
7 pending question, that you answer that question. 10:13:22  
8 Does that make sense? 10:13:24  
9 A. Yup. 10:13:24  
10 Q. Are you currently employed? 10:13:26  
11 A. I am. 10:13:27  
12 Q. And where are you currently employed? 10:13:28  
13 A. Abundant Hope Pregnancy Resource Center. 10:13:31  
14 Q. And what is your role? 10:13:33  
15 A. I am the executive director. 10:13:34  
16 Q. Does Abundant Hope go by any other names? 10:13:37  
17 A. Abundant Hope is the organization that I 10:13:44  
18 am employed by. 10:13:47  
19 Q. Okay. Does it also go by Attleboro 10:13:48  
20 Women's Health Center? 10:13:52  
21 A. It is Attleboro Women's Health Center is 10:13:53  
22 the medical arm of Abundant Hope. 10:13:58  
23 Q. What is your day-to-day involvement with 10:14:05  
24 the organization? 10:14:07

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1 supporting our assistance to women in the 10:19:46  
2 community, whether it be material resources 10:19:49  
3 required by many needy families. Or free medical 10:19:55  
4 services to women who think they are pregnant. 10:20:02  
5 Q. What material resources do you provide? 10:20:12  
6 A. We provide a monthly diaper bank which is 10:20:15  
7 open to the community. We serve about 70 babies 10:20:20  
8 a month. We offer free diapers, wipes, formula, 10:20:24  
9 baby food, clothing, blankets, furniture. 10:20:29  
10 Anything that a woman needs to take care of her 10:20:36  
11 child -- children. 10:20:44  
12 Q. And where is all of that stored? 10:20:44  
13 A. In our location in Attleboro. 10:20:47  
14 Q. At 152 Emory? 10:20:50  
15 A. Yes. 10:20:52  
16 Q. And then you said you provide free 10:20:53  
17 medical services? 10:20:55  
18 A. Correct. 10:20:56  
19 Q. For women who think they are pregnant? 10:20:56  
20 A. Correct. 10:20:58  
21 Q. What are those free medical services? 10:20:59  
22 A. We do pregnancy testing, limited 10:21:02  
23 ultrasounds, STI testing. That's it. 10:21:06  
24 Q. When you say pregnancy testing, what type 10:21:17

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1 They are a marketing firm that maintains our 10:51:12  
2 website and does our Google ads. But other than 10:51:15  
3 that -- 10:51:19  
4 Q. You said that they create and maintain. 10:51:37  
5 Do they create the language of the website? 10:51:39  
6 A. Together we did. 10:51:42  
7 Q. And with regards to the Google ads, did 10:51:44  
8 they create the language of the Google ads? 10:51:47  
9 A. They do and we approve it. 10:51:50  
10 Q. And so are clients -- the clients are 10:51:53  
11 able to make appointments through the, is it 10:52:19  
12 AWHC.net? 10:52:25  
13 A. No. They reach out to us through the 10:52:25  
14 website. We make an appointment not on an on- 10:52:28  
15 line scheduling platform. We don't have an on- 10:52:33  
16 line scheduling platform. 10:52:36  
17 Q. If I could show you another document, the 10:52:38  
18 AWHC Make an Appointment. 10:52:44  
19 (Exhibit 4 marked 10:52:49  
20 for identification) 10:53:04  
21 Q. Ms. Howard, do you recognize this 10:53:04  
22 document? 10:53:08  
23 A. Yes. 10:53:09  
24 Q. Is this an image of that, of Make an 10:53:11

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1 A. Correct. 11:24:29

2 Q. And who maintains the Abundant Hope 11:24:30

3 website? 11:24:31

4 A. We until -- April of this year we 11:24:33

5 maintained it ourself. But now we have someone 11:24:42

6 that has redesigned, an organization that 11:24:47

7 redesigned the website and they are maintaining 11:24:50

8 the Abundant Hope website. 11:24:53

9 Q. And what is that organization? 11:24:56

10 A. That's inConcert Web Solutions. 11:24:56

11 Q. inConcert Web Solutions? 11:24:59

12 A. Yes. 11:25:02

13 Q. And you talked about Google ads, what are 11:25:02

14 the Google ads for? 11:25:06

15 A. The Google ads are ads we pay for to -- 11:25:08

16 have people find our services. 11:25:16

17 Q. What services do you pay Google ads for? 11:25:21

18 I'm sorry. That was a really bad question. 11:25:25

19 What services do you advertise on Google? 11:25:28

20 A. All the services that Attleboro Women's 11:25:34

21 Health Center provides. 11:25:39

22 Q. Do you advertise the diaper banks on 11:25:40

23 Google? 11:25:44

24 A. We do not. 11:25:44

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1 COMMONWEALTH OF MASSACHUSETTS)  
2 )  
3 SUFFOLK, SS. )  
4 I, Katherine A. Tevnan, Registered Merit  
5 Reporter, Certified Shorthand Reporter No. 129093  
6 and Notary Public in and for the Commonwealth of  
7 Massachusetts, do hereby certify that DARLENE  
8 HOWARD, the witness whose deposition is  
9 hereinbefore set forth, was duly sworn by me and  
10 that such deposition is a true record of the  
11 testimony given by the witness.

12 I further certify that I am neither related  
13 to or employed by any of the parties or counsel to  
14 this action, nor am I financially interested in  
15 the outcome of this action.

16 In witness whereof, I have hereunto set my  
17 hand and seal this 4th day of November, 2024.

18  
19 Katherine Tevnan  
20 Katherine A. Tevnan,  
21 Registered Merit Reporter  
22 CSR # 129093  
23 Notary Public  
24 My commission expires March 10, 2028